

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF OKLAHOMA

IN RE
Bacone College

Debtors

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Case No. 24-80487

Chapter 11

DEBTOR'S OBJECTION TO MOTION FOR RELEASE OF TRUST FUNDS NOT
PROPERTY OF THE ESTATE

COMES NOW Debtor by and through attorney Ron D. Brown, and hereby makes objection to Pawnee Nation College (Creditor or PNC) Motion for Release of Truste Funds Not Property of the Estate. In support of this objection, the Debtor would state:

1. Debtor has no "trust funds" being held for the benefit of Creditor.
2. Creditor fails to identify proof that Debtor is in possession of certain "trust funds" totaling \$83,000.
3. Creditor fails to provide an accounting for funds which total \$83,000 in "trust funds" it owns.
4. Creditor fails to provide authority that such funds are "trust funds" as the attached "Articulation Agreement" does not so identify.
5. Creditor does not show that it should not be required to timely file a proof of claim for the debt alleged to be owed, just as every other creditor has required to do in this case.
6. Creditor fails to provide legal authority for turnover (aka "release of trust funds").
7. Debtors request that Creditor's motion be denied.

**WHEREFORE, for the reasons set forth above, Debtors respectfully request
that PNC's motion be denied.**

Respectfully submitted,

/s/ Ron Brown

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